REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended claims 27-32, 35-36, 40-41, 43 and 46. Applicant respectfully submits no new matter has been added. Accordingly, claims 27-32, 35-36 and 38-46 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Response to Arguments

In the Advisory Action, the Examiner states that "the Wilson reference teaches a Manager in the managing system managing a set of objects controlled from the managing system. The manager in Wilson sends out operation orders to the managing systems which imply operations objects sent by the manager is independent to the managing systems. These managed objects are further mapped with resources imply a data model is present. Although Wilson does not explicitly teach the types of objects used in the data model, *it would have been obvious to one of ordinary skill in the art for Wilson to implement the same objects taken from the 3GPP TS 3.172 specification and map those objects to the resources of Wilson's system to provide subscription provisioning.*

The Applicant, in the Response to Final dated March 28, 2008, pointed out that the claimed object classes are defined object classes well known to one skilled in the art. The Examiner indicated that it would have been obvious for one skilled in the art to implement the same objects and cites the 36PP TS 3.172 specification as support. The Applicant claims priority to the filing date of the EP application, which is July 18, 2002. The draft of the 3GPP TS 32.172 V0.1.0 specification is dated July, 2003. So, the Applicant description and name of the defined object classes were claimed a year before the cited art.

The Applicant also respectfully notes that the structure of the Applicant's invention is different from the prior art in that there is an internal data model that is mapped to the SuM-GI manager Data Model. As stated in the application "...the SuM-GI Agent (110, 210, 410) can describe its own data model by mapping its internal object

classes to those object classes included in the SuM-GI Data Model, so that the SuM-GI Manager (310) does not need be changed each time a new agent is introduced into the management system."

As disclosed in the Applicant's specification, each network element "...includes a Mapping Module for mapping instances of a generic data model...to an internal data model respectively included in each Provisioned Node." (para. [0066]) As previously noted in the Non-Final Office Action, Wilson does not teach or suggest a mapping module whereby a SuM-GI Data model is mapped to an internal data model in a provisioned node.

Claim Rejections – 35 U.S.C. § 102(e)

Claims 31, 32, 36, 38-40, 45 and 46 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Wilson (US 2002/0029298). The Applicant respectfully traverses the rejection of these claims.

The Applicant respectfully directs the Examiner's attention to claim 31.

> 31. A method for provisioning services to subscribers of a communication network, ...:
>
> "...sending provisioning orders from a SuM-GI Manager toward at least one SuM-GI Agent with a number of SuM-GI Operations for operating on Object Classes included in a SuM-GI Data Model;
>
> receiving the provisioning orders at a SuM-GI Agent in the Provisioned Node side of at least one Managed entity with a number of SuM-GI Operations operating on Object Classes included in the SuM-GI Data Model; and
>
> mapping in this Provisioned Node side the provisioning order received from the SuM-GI Manager with the SuM-GI Operations operating on Object Classes of the SuM-GI Data Model into a number of internal operations operating on an internal data model supported by the Managed Entity..." (emphasis added)

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California,* 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) (see also MPEP 2131). The Applicant respectfully asserts that the Wilson reference

does not disclose the above emphasized limitations. Wilson broadly discloses a managing system that manages objects via an agent. The Wilson reference does not disclose at least the SuM-Generic Interface Data Model mapping to an internal data model in a provisioned node.

As indicated above, the Applicant respectfully submits that the claimed object classes are defined object classes well known to one skilled in the art. However, the Wilson reference does not disclose the specific object classes claimed in the independent claims.

With regard to claim 40, the Wilson reference does not disclose or teach operating in accordance with an Integration Reference Point (IRP) specification within an IRP Generic Network Resource Model. Nor, as stated above, does Wilson disclose the specific group of Object classes. So, the above mentioned limitations in claims 31 and 40 are not disclosed by the Wilson reference. This being the case, the Applicant respectfully submits that Wilson fails to describe expressly or inherently the above claimed limitations in either claim 31 or 40. The Applicant respectfully requests that claims 31 and 40 be allowed and that the respective dependent claims 32, 36, 38, 45 and 46 be allowed.

Claim Rejections – 35 U.S.C. § 103 (a)

Claims 27, 29, 41, 42, 43 and 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Seymour (US Patent # 5,579,384) in view of Wilson (US 2002/0029298). The Applicant respectfully traverses the rejection of these claims.

Seymour addresses the problem of modeling information stored in Network Elements for management and control of the Network Elements so that changes at one procedure level do not interfere with other procedure levels in order to increase flexibility and efficiency of the network performance. In particular, Seymour discloses a Management Entity with means for collecting "Images" (NEImage) of a data model in each Managed Entity which utilize protocol adapters and transformation functions in the client side to contribute to build up the data model. However, Seymour teaches away from the Applicant's invention in that Seymour's receiver agent at the Network Element

does not receive generic operations acting on a generic data model but rather, specialized network data objects supported by the specific Network Element. Indeed, this Network Element does not include any Mapping Module in charge of mapping the generic data model into its own internal data model. Thus, Seymour does not teach or suggest a Generic Interface for subscription management with a Data Model including classes or combinations thereof selected from SubscriptionIRP, SubscriptionFunction and ServiceProviderFunction classes.

In regards to Wilson, Wilson discloses a Management system and a plurality of Managed systems with managed objects operated by management operations. Wilson addresses the problem of the different operations and objects that each Managed system may require. To solve this problem, Wilson provides a Mediating Managed system in charge of receiving the operation and operating the managed objects without requiring the Management system to be aware of which managed objects are managed at which Managed system. A number of Mediating Managed systems are foreseen so that they can submit to each other those operations acting on managed objects not recognized and which other Mediating Managed system can manage to operate. However, Wilson does not teach or suggest a Managed entity including a mapping module whereby a generic Data Model is mapped into an internal data model. Consequently, nothing in the Wilson reference teaches a Generic Interface for subscription management with a Data Model including classes or combinations thereof selected from SubscriptionIRP, SubscriptionFunction and ServiceProviderFunction classes.

In the Office Action, the Examiner further rejected several claims based on J.C-K. Lee et al, hereinafter Lee (Service Subscription Information Management in a TINA Environment using Object-Oriented Middleware). Lee addresses the problem of subscribers on a multi-service network who have a subscription with a service provider for access to a number of services, which can be customized under different criteria. This customization introduces the needs for multiple service profiles for each subscriber. In this respect, Lee refers to a Subscription Management Information Model that includes the data and relationships among objects required to handle subscriptions,

subscribers, and users in a retailer domain. More specifically, Lee discloses a generic object database wherein subscription data objects may be accessed. Lee discloses a Management system including an object-oriented database to provide management for object-oriented applications. However, Lee does not disclose any particular data model where a number of specific Object Classes are defined. Lee does not teach or suggest how to provide a generic interface for subscription management. Consequently, Lee does not teach or suggest the Generic Interface for subscription management with a Data Model including classes or combinations thereof selected from SubscriptionIRP, SubscriptionFunction and ServiceProviderFunction classes.

As the Applicant pointed out previously, the Applicant respectfully asserts that neither the Seymour nor Wilson references teach a Subscription Management Generic Interface nor do they teach the use of a SuM-GI Data Model being mapped to an internal Data Model in a Provisioned Mode. This being the case, the Applicant respectfully requests the allowance of claims 27, 29, 41, 42, 43 and 44.

Claims 28 and 30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Seymour (US Patent # 5,579,384) and Wilson (PGPub: 2002/0029298) in further view of J.C-K. Lee et al. hereinafter Lee (service Subscription Information Management in a TINA Environment using Object-Oriented Middleware). The Applicant respectfully traverses the rejection of these claims.

Lee is said to teach a subscription that includes an information model formed by objects representing subscription data. As noted previously, Lee does not teach or suggest a way to provide a generic interface for subscription management. As noted above the Subscription Management Generic interface, the SuM-GI Data Model and the internal data model are missing from the Wilson and Seymour references as well as the Lee reference. The Examiner states that using the term "includes" in a claim indicates intended use and this does not require steps or particular structure. The Applicant respectfully submits that the term "includes" is an equivalent of comprises and merely indicates a group of objects that are specific limitations to be applied.

Lee lacks the same limitations lacking in Wilson and Seymour, therefore, the allowance of claims 28 and 30 is respectfully requested.

Claim 35 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Wilson (PGPub: 2002/0029298) in further view of J.C-K. Lee et al. hereinafter Lee (service Subscription Information Management in a TINA Environment using Object-Oriented Middleware). The Applicant assumes that the Examiner intended to reject claim 35 and the Applicant respectfully traverses the rejection of this claim.

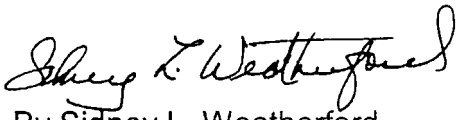
Claim 35 depends from claim 31 and contains the same limitations as claim 31. Lee does not provide the limitations missing from Wilson and Seymour. This being the case, the Applicant respectfully requests the allowance of claim 35.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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